IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

ABELSON LEGAL SEARCH,)) Plaintiff,)) v.)) BAKER DONELSON,)) Defendant.)	Civil No. 2:17-cv-02574-JPM-cgc

MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

COMES NOW Plaintiff, by and through their attorneys, and requests leave of court to file their First Amended Complaint in the above captioned matter and in support thereof, states as follows:

1. That Plaintiff desires to amend certain dates which were erroneously included in the original complaint.

2. The amended complaint does not materially change the allegations and it is not intended for harassment or delay.

3. Plaintiff counsel has consulted pursuant to local rule with opposing counsel, who indicated they have no objection to this filing.

WHEREFORE, Plaintiff requests that this Honorable Court enter an order granting them leave to file their First Amended Complaint (attached hereto as Exhibit A) and for any other relief it deems necessary and proper.

Respectfully Submitted:

/s/ William A. Wooten
William A. Wooten (TN Bar No. 26674)
WOOTEN LAW OFFICE
120 Court Square East
Covington, TN 38019
T: (901) 475-1050
F: (901) 475-0032
william@wootenlawoffice.com

/s/ Alan S. Mandel
Alan S. Mandel (admitted *pro hac vice*)
MANDEL & MANDEL, LLP
1108 Olive Street, Fifth Floor
St. Louis, MO 63101
T: (314) 621-1701
F: (314) 621-4800
wendy@mandelmandel.com

Counsel for Plaintiff Abelson Legal Search

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day October, 2017, a true and correct copy of the foregoing was electronically filed with the U.S. District Court for the Western District of Tennessee, and was served on all counsel of record by the Court's electronic filing notification system or by email.

Sam B. Blair, Jr. (TN Bar No. 10375)
Samuel P. Strantz (TN Bar No. 34461)
Baker Donelson Bearman Caldwell & Berkowitz, PC
165 Madison Avenue, Suite 2000
Memphis, TN 38103
Telephone: (901) 577-2257
Facsimile: (901) 577-0720
sblair@bakerdonelson.com
sstrantz@bakerdonelson.com